

UNITED STATES DISTRICT COURT  
SOUTHERN DISTRICT OF NEW YORK

ELLE LALLI,

Plaintiff,

-v-

WARNER BROS. DISCOVERY, INC.;  
WARNER MEDIA, LLC U.S. SEVERANCE  
PLAN,

Defendants.

Civil Action No. 1:24-cv-03178-LJL

**DEFENDANTS' NOTICE OF  
MOTION TO DISMISS AND  
MOTION TO TRANSFER VENUE TO  
THE UNITED STATES DISTRICT  
COURT FOR THE NORTHERN  
DISTRICT OF GEORGIA**

**PLEASE TAKE NOTICE** that on a date and time to be set by the Court, counsel may be heard, Defendant Warner Bros. Discovery, Inc. and Defendant Warner Media, LLC U.S. Severance Plan ("Defendants"), by and through their attorneys, Littler Mendelson, P.C., shall move before the United States District Court for the Southern District of New York, for an Order, pursuant to Fed. R. Civ. P. 8 to dismiss Plaintiff's Complaint and to require Plaintiff to file a short and plain statement of her claims, for an Order dismissing Counts 3-4, 6-7, 9-10 and 12-13 of Plaintiff's Complaint pursuant to Rule 12(b)(6). Pursuant to 28 U.S.C. § 1404(a), Defendants shall also move for an Order transferring venue of this case to the United States District Court for the Northern District of Georgia, because the Northern District of Georgia is the appropriate forum to litigate Plaintiff's claims.

**PLEASE TAKE FURTHER NOTICE** that, at the aforesaid time and place, Defendants will rely upon the accompanying Memorandum of Law in Support of Defendants' Motion to Dismiss and Motion to Transfer Venue to the United States District Court for the Northern District of Georgia and the Declarations of Ralph Beidelman and Leslie Dent, and the exhibits attached thereto, all of which are being filed and served simultaneously herewith, and all other pleadings and matters of record filed in this case.

**PLEASE TAKE FURTHER NOTICE** that a proposed form of Order is submitted herewith.

**PLEASE TAKE FURTHER NOTICE** that Defendants do not request oral argument.

Dated: November 25, 2024  
New York, New York

LITTLER MENDELSON, P.C.

By: /s/ William J. Anthony

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